

Michael W. Armstrong, Esq., (SBN: 87799)



Nolan, Armstrong
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EXHIBIT A

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Attorney for Defendant
Juan Pablo Bolivar

UNITED STATES OF AMERICA
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN PABLO BOLIVAR, ET AL.,

Defendants.

Case No. CR 10-00824 DLJ

STIPULATION AND []
ORDER TO CONTINUE STATUS
HEARING

Date: April 11, 2013

Time: 9:00 a.m.

Court: The Hon. D. Lowell Jensen

It is hereby stipulated between the parties, Michael W. Armstrong, attorney for defendant, Juan Pablo Bolivar, and Assistant United States Attorney Thomas Colthurst for the United States of America, that the presently scheduled status hearing of April 11, 2013 be rescheduled to Thursday, May 2, 2013 at 9:00 a.m. before the Honorable D. Lowell Jensen.

The reason for the continuance is that the AUSA, Thomas Colthurst, will most likely be unable to obtain approval from his office for the proposed plea agreement (defense counsel only having notified Mr. Colthurst to seek such approval several days ago), until tomorrow April 10, and that won't give defense counsel enough time to meet with his client and discuss the plea agreement before the court date on Thursday, April 11. Defense counsel will be on vacation from April 17-30. The next available date for both counsel is May 2, 2013.

1 The parties agree that the time between April 11, 2013 through May 2, 2013 is properly
2 excluded pursuant to the Speedy Trial Act, Title 18 United States Code, sections 3161(h)(7)(A)
3 and 3161(h)(7)(B)(iv) in the interests of justice.

4 SO STIPULATED:

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6 Dated: April 9, 2013

NOLAN, ARMSTRONG & BARTON, LLP

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8 _____/s/_____
Michael W. Armstrong
9 Attorney for Defendant, Juan Pablo Bolivar

10 MELINDA HAAG
11 United States Attorney

12 Dated: April 9, 2013

13 _____/s/_____
THOMAS COLTHURST
14 Assistant United States Attorney

15
16 **ORDER**

17 For the foregoing reasons, the Court continues the next status conference in this case from
18 April 11, 2013 to May 2, 2013 at 9:00 a.m. For the reasons stated above, the Court further finds
19 that the ends of justice served by granting the requested continuance outweigh the best interests of
20 the public and the defendant in a speedy trial. See U.S.C. § 3161(h)(7)(A) and 3161(h)(8)(7)(iv).
21 Accordingly, time shall be excluded from April 11, 2013 through May 2, 2013.

22 SO ORDERED.

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24 Dated: April F€, 2013

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THE HONORABLE D. LOWELL JENSEN
26 U.S. DISTRICT COURT JUDGE
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